

1 PHILLIP A. TALBERT  
2 United States Attorney  
3 JESSICA A. MASSEY  
4 Assistant United States Attorney  
5 2500 Tulare Street, Suite 4401  
6 Fresno, CA 93721  
7 Telephone: (559) 497-4000  
8 Facsimile: (559) 497-4099

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11 Attorneys for Plaintiff  
12 United States of America

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14 IN THE UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA

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17 UNITED STATES OF AMERICA,  
18 Plaintiff,  
19 v.  
20 TILISHA MORRISON,  
21 Defendant.

22 CASE NO. 1:22-CR-00177-DAD-BAM  
23 STIPULATION REGARDING EXCLUDABLE  
24 TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
CURRENT DATE: September 14, 2022  
TIME: 1:00 p.m.  
COURT: Hon. Barbara A. McAuliffe

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27 STIPULATION

28 Plaintiff United States of America, by and through its counsel of record, and defendant TILISHA  
MORRISON, by and through defendant's counsel of record, Monica Bermudez, hereby stipulate as  
follows:

- 29 1. By previous order, this matter was set for status on September 14, 2022.
- 30 2. By this stipulation, defendant now moves to continue the status conference until  
31 December 14, 2022, and to exclude time between September 14, 2022, and December 14, 2022, under  
32 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
- 33 3. If defendant ultimately does not enter a guilty plea and decides to proceed to trial, the  
34 parties agree and stipulate, and request that the Court find the following:

35 a) The government asserts that initial discovery has been provided to counsel. The  
36 government is currently processing additional discovery and anticipates production to counsel in

1 the coming days. The government is aware of its ongoing discovery obligations.

2 b) The government is amenable to providing a plea offer if the defendant requests  
3 one.

4 c) Counsel for the defendant desires additional time to consult with her client, to  
5 review the current charges, to conduct investigation and research related to the charges, to review  
6 and/or copy discovery for this matter, to discuss potential resolutions with her client, to prepare  
7 pretrial motions, and to otherwise prepare for trial.

8 d) Counsel for defendant believes that failure to grant the above-requested  
9 continuance would deny them the reasonable time necessary for effective preparation, taking into  
10 account the exercise of due diligence.

11 e) The government does not object to the continuance.

12 f) Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of September 14, 2022 to December  
17 14, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local  
18 Code T4], because it results from a continuance granted by the Court at defendant's request on  
19 the basis of the Court's finding that the ends of justice served by taking such action outweigh the  
20 best interest of the public and the defendant in a speedy trial.

21 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
23 must commence.

24 IT IS SO STIPULATED.

25 Dated: September 8, 2022

PHILLIP A. TALBERT  
United States Attorney

26  
27 /s/ JESSICA A. MASSEY  
28 JESSICA A. MASSEY  
Assistant United States Attorney

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2 Dated: September 8, 2022  
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/s/ MONICA BERMUDEZ  
MONICA BERMUDEZ,  
Counsel for Defendant  
TILISHA MORRISON

6 **ORDER**  
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IT IS SO ORDERED that the status conference is continued from September 14, 2022, to  
**December 14, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.** Time is excluded  
pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

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10 IT IS SO ORDERED.  
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12 Dated: September 8, 2022

/s/ Barbara A. McAuliffe

13 UNITED STATES MAGISTRATE JUDGE  
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